

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ZIFF DAVIS, INC., ZIFF DAVIS, LLC, IGN  
ENTERTAINMENT, INC. and EVERYDAY  
HEALTH MEDIA, LLC,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI,  
LLC, OPENAI OPCO LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION, and  
OPENAI HOLDINGS, LLC,

Defendants.

Civ. Action No. \_\_\_\_\_

**PLAINTIFFS' RULE 7.1 STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1, the undersigned counsel for Plaintiffs Ziff Davis, Inc., Ziff Davis, LLC, IGN Entertainment, Inc., and Everyday Health Media, LLC (private non-governmental parties) certifies that Ziff Davis, Inc. is a publicly held corporation, Ziff Davis, LLC is a wholly-owned subsidiary of Ziff Davis, Inc., IGN Entertainment, Inc. is a wholly-owned subsidiary of Ziff Davis, LLC, and Everyday Health Media, LLC is a wholly-owned subsidiary of Everyday Health, Inc., a wholly-owned subsidiary of Ziff Davis, LLC. BlackRock Inc. owns more than 10% of the shares of Ziff Davis, Inc.

Dated: April 24, 2025

Respectfully submitted,

BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP

OF COUNSEL:

Lacy H. (“Lance”) Koonce, III  
Matthew Leish  
Gili Karev  
Mariella Salazar  
Clara Cassan  
KLARIS LAW PLLC  
161 Water Street  
New York, NY 10038  
(917) 612-5861

/s/ Kristen Healey Cramer  
Kristen Healey Cramer (#4512)  
Noelle B. Torrice (#5957)  
1313 N. Market Street, Suite 1201  
Wilmington, Delaware 19801  
(302) 442-7010  
[kcramer@beneschlaw.com](mailto:kcramer@beneschlaw.com)  
[ntorrice@beneschlaw.com](mailto:ntorrice@beneschlaw.com)

*Attorneys for Plaintiffs Ziff Davis, Inc., Ziff Davis,  
LLC, IGN Entertainment, Inc., and Everyday  
Health Media, LLC*